

1           **RICHARD A. HARRIS, ESQ.**

2           Nevada State Bar No. 505

3           **JOSHUA R. HARRIS, ESQ.**

4           Nevada State Bar No. 9580

5           RICHARD HARRIS LAW FIRM

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11          **Attorney for Plaintiff**

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13           **UNITED STATES DISTRICT COURT**  
14           **DISTRICT OF NEVADA**

15          JACQUELYN A. MARZAN,

16          Case No 2:21-cv-01647-DJA

17          Plaintiff,

18          vs.

19          KILOLO KIJAKAZI,  
20          Commissioner of Social Security  
21          Administration,

22          FIRST STIPULATION AND  
23          ~~[PROPOSED]~~ ORDER FOR  
24          EXTENSION OF TIME TO FILE  
25          MOTION FOR REMAND

26          Defendant.

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28          Comes now Plaintiff, by and through her attorney, JOSHUA R. HARRIS, ESQ., and  
29          requests a TWENTY-NINE (29) calendar day extension of time, to file the **MOTION FOR**  
1          **REMAND**, up to and including April 1, 2022.

2          Plaintiff's current deadline to file the **MOTION FOR REMAND** is March 3, 2022..

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4          The Appellate Attorney Writer had multiple briefs due in a short-time span and had  
5          pandemic related staff reductions.

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7          Via email on February 24, 2022, at 8:08am, opposing counsel expressed no objection to  
8          the extension.

1 It is therefore respectfully requested that Plaintiff be granted a TWENTY-NINE (29)  
2 calendar day extension of time, to file the **MOTION FOR REMAND**, up to and including  
3 April 1, 2022.

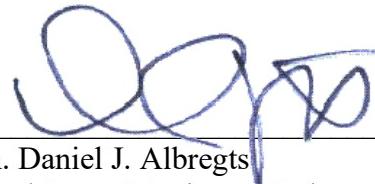
4 DATED this 28<sup>th</sup> day of February, 2022.

5 /s/ Joshua R. Harris  
6 JOSHUA HARRIS, ESQ.  
7 Nevada State Bar No. 9580  
8 Richard Harris Law Firm  
9 801 S Fourth St.  
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13 Email: [josh@richardharrislaw.com](mailto:josh@richardharrislaw.com)  
14 Attorney for Plaintiff

DATED this 28<sup>th</sup> day of February, 2022.

5 /s/ Allison Cheung  
6 ALLISON CHEUNG  
7 Social Security Administration  
8 Assistant Regional Counsel  
9 160 Spear St., Suite 800  
10 San Francisco, CA 94105  
11 Telephone: (510) 970-4811  
12 Facsimile: (415) 744-0134  
13 Email: [allison.cheung@ssa.gov](mailto:allison.cheung@ssa.gov)  
14 Attorneys for Defendant

15 IT IS SO ORDERED.



16 Hon. Daniel J. Albregts  
17 United States Magistrate Judge

18 DATED: March 1, 2022

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1 CERTIFICATE OF SERVICE  
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I, Noel S. Anschutz, Paralegal, certify that the following individual was served with a copy of  
the FIRST STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO  
FILE MOTION FOR REMAND on the date and via the method of service identified below:

CM/ECF:

ALLISON CHEUNG

Social Security Administration  
Assistant Regional Counsel  
160 Spear St., Suite 800  
San Francisco, CA 94105  
Telephone: (510) 970-4811  
Facsimile: (415) 744-0134  
Email: [allison.cheung@ssa.gov](mailto:allison.cheung@ssa.gov)

Attorneys for Defendant

DATED: February 28, 2022  
/s/ Noel S. Anschutz, Paralegal